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John Cryan, Christian Sewing,  
Marcus Schenck, and James Von Moltke

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and On Behalf of	:	Case No. 2:20-cv-08978
All Others Similarly Situated,	:	
Plaintiff,	:	Hon. Esther Salas, U.S.D.J.
v.	:	Hon. Michael A. Hammer, U.S.M.J.
DEUTSCHE BANK	:	<b>REPLY DECLARATION OF DAVID</b>
AKTIENGESELLSCHAFT, JOHN CRYAN,	:	<b>G. JANUSZEWSKI IN FURTHER</b>
CHRISTIAN SEWING, MARCUS	:	<b>SUPPORT OF DEFENDANTS'</b>
SCHENCK, and JAMES VON MOLTKE,	:	<b>MOTION TO TRANSFER</b>
Defendants.	:	<b>PURSUANT TO 28 U.S.C. § 1404(a)</b>
	:	<b>OR, IN THE ALTERNATIVE,</b>
	:	<b>DISMISS PLAINTIFFS' SECOND</b>
	:	<b>AMENDED CLASS ACTION</b>
	:	<b>COMPLAINT</b>

I, DAVID G. JANUSZEWSKI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am admitted *pro hac vice* to appear before this Court and am a member of the law firm CAHILL GORDON & REINDEL LLP, attorneys for Defendants Deutsche Bank Aktiengesellschaft (“Deutsche Bank”), John Cryan, Christian Sewing, Marcus Schenck, and James Von Moltke in the above-captioned action. I submit this declaration to place before the Court a publicly available document that is referenced in Plaintiffs’ Second Amended Complaint as well as the accompanying Reply Memorandum of Law in Support of Defendants’ Motion to transfer this action to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a), or in the alternative, dismiss the Plaintiffs’ Second Amended Class Action Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the August 3, 2018 Reuters article titled “Exclusive: Deutsche Bank reports show chinks in money laundering armor” by Edward Taylor, Tom Sims, and John O’Donnell, available at <https://www.reuters.com/article/us-deutsche-bank-moneylaundering-exclusi/exclusive-deutsche-bank-reports-show-chinks-in-money-laundering-armor-idUSKBN1KO0ZC>.

Executed on: July 1, 2021  
Edgartown, Massachusetts



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David G. Januszewski